

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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Christina Gonzalez,

Plaintiff,

Index No.: 15-CV-08317

v.

VERIFIED ANSWER

Rush Discount World Inc, and
Ravi Bishunath,

Defendants.
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Defendants, by their Attorneys, JOSEPH A. ALTMAN, P.C., as and for their Verified Answer to the Plaintiff's Complaint, respectfully sets forth as follows:

1. Denies any knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraphs numbered "1", "2", "4", "5", "6", "7", "9", "20", "25", "26", "33", "38", "39", and "42" of the Plaintiff's Verified Complaint.

2. Denies each and every allegation contained in the paragraphs numbered "3", "10", "11", "12", "13", "14", "15", "16", "17", "18", "19", "21", "22", "23", "24", "27", "28", "29", "30", "31", "32", "34", "35", "36", "37", "41", "43", "44", "45", "46", "48", "49", "50", "51", "52", "54", "55", "56", "57", "58", "59", "60", "61", "62", "63", "64", "65", of the Plaintiff's Verified Complaint.

3. Repeats and realleges each and every statement in paragraphs "1" and "2" above as to each and every allegation in paragraphs "40", "47" and "53" of the Plaintiff's Complaint.

AS AND FOR A FIRST AFFIRMATIVE DEFENSE

4. That the Plaintiff, during some of the time at issue, was only a part-time employee, who worked for a brief period of time.

AS AND FOR A SECOND AFFIRMATIVE DEFENSE

5. That the Plaintiff received payment, in accordance with all applicable laws, rules and/or Regulations, for the dates, times and hours of the Defendant's actual work.

AS AND FOR A THIRD AFFIRMATIVE DEFENSE

6. That the Plaintiff's complaint fails to state any claim or Cause of Action upon which any type of relief can be granted.

AS AND FOR A FOURTH AFFIRMATIVE DEFENSE

7. That the within claim(s) and cause(s) of action is barred by the Plaintiff's actions and omissions herein, since the Plaintiff accepted payment pursuant to the Plaintiff's direction and request, with the Plaintiff receiving a payment from the corporate Defendant, and accepting said payments, as payment in full.

AS AND FOR A FIFTH AFFIRMATIVE DEFENSE

8. That the individual Defendant is shielded by the corporate veil of the Corporate Co-Defendant.

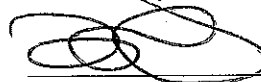
AS AND FOR A SIXTH AFFIRMATIVE DEFENSE

9. That the Defendant, Ravi Bishunath, lacks any privity with the Plaintiff, with said Defendant not the Plaintiff's employer.

WHEREFORE, the Defendants demands Judgment dismissing the Plaintiff's Complaint herein, together with the costs and disbursements of this Action.

Dated: Bronx, New York
November 5th, 2015

Yours etc.,



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